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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WILLIE THURMOND and DAVID
THOMAS, Individually and on behalf of
others similarly situated,

Plaintiff,

vs.

PRESIDENTIAL LIMOUSINE,
PRESIDENTIAL LIMOUSINE, A NEVADA
CORPORATION, and PRESIDENTIAL
LIMOUSINE CONCIERGE SERVICE,
INC., and BRENT J. BELL,

Defendants.

CASE NO.: 2:15-cv-01066-MMD-PAL

**DISCOVERY PLAN AND
SCHEDULING ORDER**

**SPECIAL SCHEDULING REVIEW
REQUESTED**

Plaintiffs WILLIE THURMOND and DAVID THOMAS (the "Named Plaintiffs")
and Defendants PRESIDENTIAL LIMOUSINE, PRESIDENTIAL LIMOUSINE, A
NEVADA CORPORATION, and PRESIDENTIAL LIMOUSINE CONCIERGE SERVICE,
INC., and BRENT J. BELL ("Defendants"), hereby submit the following Stipulated
Discovery Plan and Scheduling Order.

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PROPOSED DISCOVERY SCHEDULE

1. Rule 26(f) Conference

Pursuant to FRCP 26(f), a meeting was held telephonically on October 1, 2015 and was attended by Dana Sniegocki on behalf of Plaintiffs and R. Calder Huntington on behalf of Defendants .

2. Discovery Deadlines

A. Initial Disclosures. The parties agree to exchange initial disclosures pursuant to FRCP 26(a)(1)(c) and will exchange initial disclosures on or before November 10, 2015.

B. Discovery Cut-Off Date. Discovery should be scheduled to conclude within twelve (12) months of the filing of the Defendants' Motion to Dismiss in this matter, meaning on **June 10, 2016**.

C. Amendment of Pleadings and Joinder of Parties. Motions to add parties or amend the pleadings shall be submitted no later than **March 14, 2016**.

D. Expert Disclosures. Initial expert disclosures shall be made by **April 11, 2016** and rebuttal expert disclosures shall be made by **May 11, 2016**.

E. Dispositive Motion Deadline. Dispositive motions shall be filed no later than **July 11, 2016**.

F. Joint Pretrial Order. The joint pretrial order shall be filed no later than **August 9, 2016**, if no dispositive motions are filed and undecided. If any dispositive motions are filed and undecided, the joint pretrial order shall be filed within 30 days after decisions have been issued on all dispositive motions.

1 **G. Extensions of Scheduled Deadlines.** Motions or stipulations to extend
2 any of the aforementioned deadlines must be made 21 days prior to the occurrence of
3 each deadline date pursuant to LR 26-4.

4 **H. Interim Status Report.** Pursuant to LR 26-3, an interim status report
5 shall be filed no later than 60 days before the discovery cut-off date, meaning on **April**
6 **11, 2016.**

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8 **3. Why Additional Time for Discovery is Requested**

9 This Stipulated Discovery Plan and Scheduling Order seeks a discovery period
10 that exceeds the time otherwise dictated by LR 26-1(e) by a period of six months. The
11 parties request the additional three months of discovery because this case involves
12 both collective action claims under the Fair Labor Standards Act as well as class action
13 claims under Fed. R. Civ. P. 23. The parties believe the additional six months of
14 discovery is warranted to allow sufficient time for all parties to gather the necessary
15 information to bring this case to trial.
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1 Dated: October 19, 2015

Dated: October 19, 2015

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3 Respectfully submitted,

Respectfully submitted,

4 /s/ Dana Sniegocki
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14 **IT IS SO ORDERED.**

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17 DATE

U.S. MAGISTRATE JUDGE